

1 Honorable Marc Barreca
2 Chapter 7

3 Hearing Location: ZoomGov
4 Hearing Date: September 13, 2023
5 Hearing Time: 10:00 AM
6 Response Date: September 6, 2023

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8 UNITED STATES BANKRUPTCY COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 In re: : Chapter 13 Proceeding
11 WAYNE RICHARD PELUSO and : Case No.: 23-11187-MLB
12 RONI SUE PELUSO, :
13 *Debtor(s).* : DECLARATION OF DEBTOR
14 : IN SUPPORT OF MOTION
15 : TO AVOID JUDGMENT LIEN

16 My name is Roni Sue Peluso and I write this declaration in support of my motion to
17 avoid a judgment lien against my home.

18 1. On June 29, 2023, I filed this Chapter 7 bankruptcy.
19 2. I own a home located at 6286 Music Place, Maple Falls, Washington which had a fair
20 market value of \$ 137,203.00 when I filed this bankruptcy.
21 3. I was living in my 6286 Music Place home when I filed this bankruptcy and I continue
22 to live there.
23 4. I do not owe a mortgage on the 6286 Music Place home.
24 5. I listed my 6286 Music Place home on my bankruptcy schedules and claimed it as
25 exempt.
26 6. On April 9, 2021, Midland Credit Management, Inc. obtained a default judgment
27 against me in Whatcom County District Court (Case No.CV20-1624). The total judgment

1 amount is \$22,437.73. The default judgment was recorded with the Whatcom County Auditor
2 under recording number 2023-0601078 on June 14, 2023.
3

4 7. I listed Midland Credit Management, Inc. as a creditor in my bankruptcy schedules.

5 8. I respectfully request that the court avoid and cancel Midland Credit Management,
6 Inc.'s judgment lien against my home.

7 I have read my motion to avoid judgment lien and declare under penalty of perjury that
8 all the statements contained therein, as well as all the statements contained in this declaration, are
9 true and correct.
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11 Date: 08/01/2023

12 /s/ Roni Sue Peluso
Roni Sue Peluso, Debtor
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DECLARATION OF DEBTOR
IN SUPPORT OF MOTION
TO AVOID JUDGMENT LIEN

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